

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

C.A. #04-11383-RGS

_____	)
TOWN OF CANTON,	)
	)
Plaintiff,	)
	)
v.	)
	)
SELECT ENERGY, INC.,	)
	)
Defendant.	)
_____	)

Local Rule 16.1 Joint Statement

Pursuant to Local Rule 16.1 (D), counsel for the parties have conferred and submit the following joint statement:

1. Initial Disclosures.

The parties shall make the initial disclosures required by Fed. R. Civ. P. 26(a)(1) by October 4, 2004.

2. Discovery Schedule:

The parties proposed the following schedule for completing discovery:

Interrogatories, Requests for Admissions and Requests for Production of Documents to be propounded	January 7, 2005
Motions to Amend pleadings filed	January 28, 2005
Fact Depositions completed	May 31, 2005
Service of Plaintiff's expert reports	June 30, 2005
Service of Defendant's expert reports	August 19, 2005
Discovery Completed, including expert depositions	September 16, 2005

Dispositive Motions filed

October 28, 2005

PreTrial Conference to be held

60 Days after  
Decision and Order  
on dispositive  
motions, if any.

3. Discovery Event Limitations.

At this time, the parties do not believe that any adjustment of the discovery limitations contained in Fed. R. Civ. P. 30(d) and Local Rule 26.1(C) will be needed.

4. Certifications.

The Certifications required by Local Rule 16.1(D)(3) will be filed separately by counsel.

5. Trial by Magistrate Judge.

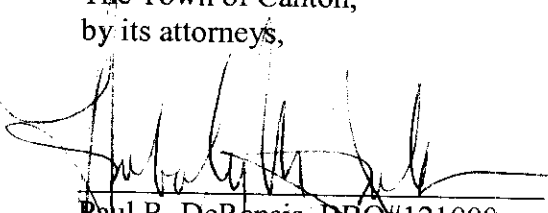
The parties have considered a trial by a Magistrate Judge but do not consent to a trial by a Magistrate Judge in this matter.

6. Alternative Dispute Resolution.

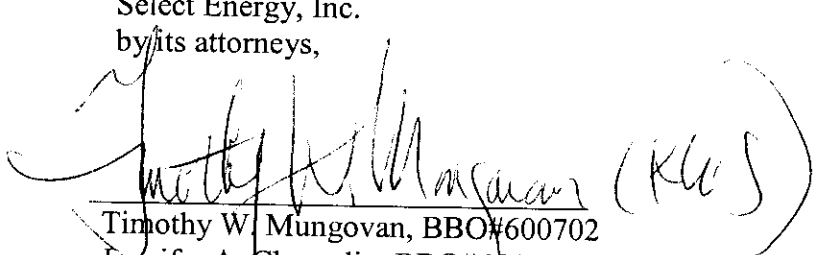
The parties have discussed mediation as a potential avenue for alternative dispute resolution of this matter.

Respectfully submitted,

The Town of Canton,  
by its attorneys,

  
Paul R. DeRensis, BBO#121000  
Kimberly M. Saillant, BBO#548775  
DEUTSCH WILLIAMS BROOKS  
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Select Energy, Inc.  
by its attorneys,

  
Timothy W. Mungovan, BBO#600702  
Jennifer A. Champlin, BBO#654726  
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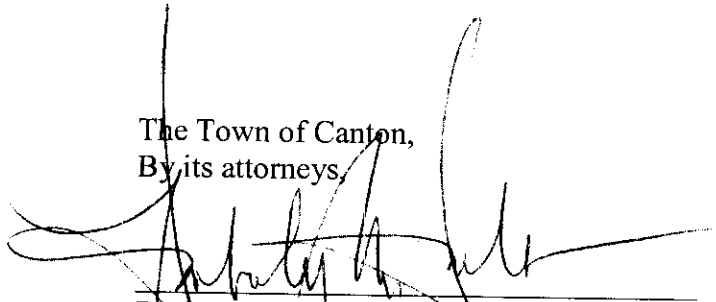
CERTIFICATE OF SERVICE

I do hereby certify that I sent a true copy of the Local Rule 16.1 Joint Statement to the following persons, by hand on August 27, 2004:

Counsel for the defendant, Select Energy, Inc:

Timothy W. Mungovan, BBO#600702  
Jennifer A. Champlin, BBO#654726  
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Boston, Massachusetts 02110  
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The Town of Canton,  
By its attorneys,



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